

## REMARKS

The Office Action dated March 26, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-23 and 41-54, including independent claims 1, 14, 41, 45, and 49-54, are currently pending in the application. Applicants here amend claims 41, 43-46, 48-52, and 54 to more particularly point out and distinctly claim the subject matter of the present application. It is respectfully submitted that the claim amendments add no new subject matter and serve only to place the present application in better condition for allowance, and thus, entry of the claim amendments is respectfully requested. It is believed that all grounds for rejection in the Office Action are currently addressed and that the present application is currently in condition for reconsideration in view of the amendment and the following comments. Reconsideration of claims 1-23 and 41-54 is respectfully requested.

### Rejection under 35 U.S.C. §103(a)

Claims 1, 3-23, 41, and 43-54 were rejected as being obvious in view of U.S. Patent No. 6,651,105 (Bhagwat) in combination with U.S. Patent Publication No. 2007-0127495 (de Gregorio). In particular, the Office Action alleges that Bhagwat discloses most of the recited elements of these claims, but concedes that Bhagwat does not disclose or suggest a solution in which a global address is not known to a mobile entity. To address this deficiency, the Office Action cites to de Gregorio as allegedly disclosing this

claim limitation . Applicants respectfully urge that the combination of Bhagwat and de Gregorio fails to teach or suggest every recited limitation of claims 1, 3-23, 41, and 43-54, as described in greater detail below. Applicants further urge that the combination of Bhagwat and de Gregorio is legally improper. Accordingly, reconsideration and allowance of these claims are respectfully requested in view of the following comments.

Independent claim 1, from which claims 2-13 depend, relates to a method, including sending a message including information for identifying a first network access entity from a mobile entity to a second network access entity, wherein a global address of the first network access entity is not known to the mobile entity. The message is configured to enable a connection of the mobile entity to be handed over from the first network access entity to the second network access entity, and wherein the message is configured to enable the second network entity to direct traffic destined to the first network entity.

Independent claim 14, from which claims 15-23 depend, recites a method that includes forming a message for handing over a connection of a mobile entity from a first network access entity to a second network access entity, wherein a global address of the second network access entity is not known to the mobile entity. The method further includes sending the message with information for identifying the second network access entity from the mobile entity to the first network access entity. The message therefore enables the first network access entity to direct traffic to the second network access entity.

Independent claim 41, from which claims 42-43 depend, relates to an apparatus, configured to send a message including information for identifying a first network access entity to a second network access entity which enables the second network access entity to direct traffic to the first network access entity. A global address of the first network access entity is not known to the apparatus.

Independent claim 45, from which claims 46-48 depend, recites an apparatus, configured to send a message including information for identifying a second network access entity to a first network access entity, which enables the first network access entity to direct traffic to the second network access entity. Again, a global address of the second network access entity is not known to the apparatus.

Independent claim 49 relates to a computer program embodied on a computer readable medium, the computer readable medium storing computer executable instructions configured to control a processor to perform a method. The method includes forming a message which enables a second network entity to direct traffic destined to a first network entity. In this step, a global address of the first network access entity is not known to a mobile entity. The message is then sent and includes information for identifying the first network access entity from the mobile entity to the second network access entity.

Independent claim 50 relates to a computer program embodied on a computer readable medium. The computer readable medium stores computer executable instructions configured to control a processor to perform a method. This method includes forming a message which enables a first network entity to direct traffic destined to a

second network entity, wherein a global address of the first network access entity is not known to a mobile entity. The sent message includes information for identifying the second network access entity from the mobile entity to the first network access entity.

Independent claim 51 relates to first network access entity that is configured to receive a message from a mobile entity. The message includes information for identifying a second network access entity to the first network access entity, wherein a global address of the second network access entity is not known to the mobile entity. This entity is further configured to use the message to direct traffic to the second network access entity.

Independent claim 52 relates to an apparatus that includes forming means for forming a message including information for identifying the first network access entity to the second network access entity which enables the second network access entity to direct traffic to the first network access entity, wherein a global address of the first network access entity is not known to the apparatus. The apparatus further includes sending means for sending the message.

Independent claim 53 relates to an apparatus. The recited apparatus includes a forming means for forming a message including information for identifying a second network access entity to a first network access entity, which enables the first network access entity to direct traffic to the second network access entity. In particular, a global address of the second network access entity is not known to the apparatus. The apparatus further includes a sending means for sending the message.

Independent claim 54 relates to first network access entity. The first network access entity includes receiving means for receiving a message from a mobile entity, the message including information for identifying a second network access entity to the first network access entity, wherein a global address of the second network access entity is not known to the mobile entity. The first network access entity further includes traffic directing means for using the message to direct traffic to the second network access entity.

Applicants have carefully reviewed the combination of Bhagwat and de Gregorio and respectfully urge that the combination neither teaches nor suggests all of the recited features in any of the presently pending claims.

Bhagwat discloses a method for seamless network support for mobile devices using serial communication. In particular, as derivable from the abstract, a method is described by which a mobile device may roam securely and seamlessly from one access point to another access point without disrupting an active PPP connection.

The Office Action refers in particular to Bhagwat at column 8, line 65, to column 9, line 5, and at column 10, lines 43 to 47. The cited passages of Bhagwat describe that a Greet message is sent to the new access point, the Greet message containing the IP address of the backend server to which a PPP connection has been established. Applicants note that the address of the backend server has to be known in the disclosure of Bhagwat. Specifically, Bhagwat assumes that all necessary addresses are globally known, as noted in the Office Action.

Furthermore, as also shown, for example, in Fig. 5 of Bhagwat, this reference discloses a configuration in which the backend server is always the same. For example, the PPP session in Bhagwat is conducted with this PPP backend server (PBS) only, whereas the access of the mobile entity changes from AP1 to AP2. This handover is described in Bhagwat at paragraph [0077], and this paragraph does not disclose or suggest that addresses or other information for identifying the address points are exchanged. Instead, this section of Bhagwat only specifies that the IP address of the PPP backend server is forwarded in order to be able to continue a PPP session with this server. Applicants urge, however, that this forwarded information does not present information for identifying one of the two access points AP1 and AP2. Thus, since Bhagwat does not disclose or suggest sending a message including such identifying information from the mobile entity to one of the two access points, Bhagwat does not teach or suggest the limitation that the message contains information that enables the second network access entity to direct traffic to the first network access entity is also not shown, as recited, for example, in claim 1 of the present application.

Continuing with Bhagwat, information regarding a secret key for a tunnel session is also sent in the Greet message. The secret key is also described in Bhagwat at column 8, line 27 as a “random secret key.” However, Bhagwat does not specify whether this key can be used in any way to identify one of the access points, and certainly cannot be used to access the new access point. Applicants further note that the Office Action does not specify which part of the Greet message in Bhagwat is considered as information for identifying an access point.

For at least these reasons, Applicants urge that Bhagwat does not suggest or disclose that information for identifying an access point, of which the global address is not known, is sent to the other access point, as recited in claim. Moreover, Applicant note that there is also no reason for identifying an access point in the configuration disclosed in Bhagwat, since, as described above, this reference assumes that all addresses concerned are globally known (and therefore, the exchange of identifying information is unnecessary).

The Office Action takes the position that de Gregorio, cures these and other deficiencies in Bhagwat. However, as described below each of the pending claims in the present application includes features that are not disclosed or suggested in either of Bhagwat or de Gregorio, individually or in combination, and therefore the pending claims are allowable over this cited combination.

In detail, Gregorio describes a method for providing Single Sign-On services for a user roaming in a packet radio network of a Multinational Mobile Network Operator that includes a federation of National Network Operators. The Office Action specifically refers to de Gregorio at paragraph [0077] that describes how a user may access home or external services through a web browser, when an incoming IP connection is received from the user in the Multinational Mobile network Operator (MN-MNO) Global Service Network. De Gregorio discloses checking whether the user is trusted, has been previously authenticated, and has an active session running.

However, this and other disclosure in de Gregorio does not describe or suggest access entities or whether a global address of access entities is not known to the user.

Only the IP address of the user as such is mentioned in de Gregorio, but the reference is silent regarding the network address of the other entities involved. Furthermore, Gregorio does not relate to a handover.

For this and other reasons, de Gregorio does not cure the above described deficiencies in Bhagwat. For example, Applicants note that neither Bhagwat nor de Gregorio teaches or discloses the limitation in claim 1 of “ending a message including information for identifying a first network access entity from a mobile entity to a second network access entity, wherein a global address of the first network access entity is not known to the mobile entity.” Thus claim 1 is allowable over the combination of Bhagwat and de Gregorio.

Likewise, independent claim 14, 41, 45, and 49-54, although separate in scope from claim 1, recite similar limitations and should also be allowable on similar basis. Furthermore, dependent claims 3-12, 15-23, 43-44, and 46-48 are likewise allowable over the combination of Bhagwat and de Gregorio for at least the reasons of depending from an allowable claim, as well as for the separate limitations recited in these claims. Reconsideration and allowance of claims 1, 3-23, 41, and 43-54 are respectfully requested.

Applicants further urge that the combination of de Gregorio and Bhagwat is legally improper under 35 U.S.C. §103(a). As described above, Gregorio leads in a completely different direction and cannot give any solution for the problem underlying the present application. Thus, a person skilled in the art would not even combine both references. Also, a person skilled in the art could not combine de Gregorio and Bhagwat



without undue experimentation and improper hindsight to arrive at the recited embodiments of the present invention. For example, Bhagwat does not describe anything regarding exchanging of addresses (or identification information) of access points. Thus, even when Gregorio would disclose that a global address of such an access point is not known, this would only describe the problem underlying the present application, but does not give any solution at all.

Claims 2 and 42 were rejected under 35 U.S.C. §103(a) as being unpatentable in view of the combination of Bhagwat and de Gregorio, further in view of U.S. Published Patent Application No. 2003-0225892 (Takusagawa). Specifically, the Office Action took the position that de Gregorio and Bhagwat disclose the limitation of the independent claims 1 and 41 and Takusagawa disclosed the additional limitation recited in these claims. However, as described below, the combination of Bhagwat, de Gregorio, and Takusagawa fails to provide the limitations in any of the pending claims.

As described above, Bhagwat and de Gregorio fail to disclose every limitation in any of the pending claims. Takusagawa does not cure these deficiencies in Bhagwat and de Gregorio.

Specifically, Takusagawa relates to assigning an old “care-of” address to a mobile node in the communication area of the old access router, when the mobile node is communicating with a correspondent node. Before the mobile node enters the communication area of a new access router, a binding update message is transmitted to a diverging point router. The diverging point router is a router device located in the node

where a route from the correspondent node to the old access router and a route from the correspondent router to the new access router are diverged. The diverging point router then transfers packets addressed to the old care-of address to the new care-of address assigned to the mobile node in the communication area of the new access router (see Takusagawa at FIGS. 1 and 2).

Applicants therefore urge that Takusagawa also does not disclose or suggest the limitation of sending a message including information for identifying a first network access entity to a second network access entity, as recited in claims 1 and 41. Accordingly, claims 1 and 41 are allowable over the combination of Bhagwat, de Gregorio, and Takusagawa. Claims 2 and 42 depend from claims 1 and 41, respectively, and are therefore also allowable over this combination of references for at least the reason of depending from allowable claims, as well as for the separate limitations recited in these claims.

In summary, each of claims 1-23 and 41-54 recites subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 1-23 and 41-54 be allowed and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Petition for Extension of Time  
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